



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

August 1, 2013

Darin K. Chappell  
City Administrator  
PO Box 9  
Bolivar, Missouri 65613  
(copy via email: [cityadmin@bolivar.mo.us](mailto:cityadmin@bolivar.mo.us))

RE: Administrative Order for Compliance on Consent  
EPA Docket No. CWA-o7-2007-0068

Dear Mr. Chappell:

Thank you for meeting with Wayne Dillard and me from the Environmental Protection Agency, Region 7, and Sieu Dang of the Missouri Department of Natural Resources on July 24, 2013, to discuss the City's progress toward meeting the objectives of the Order for Compliance on Consent. Our discussion was helpful in explaining the actions the City has taken to date to address sanitary sewer overflows, basement backups and bypasses and the remaining work expected to be preformed. As we discussed at the meeting, we are providing a summary of what we learned and asking the City to confirm our understanding of these matters and provide any additional information, as appropriate. The City's next annual report is scheduled for January 28, 2014.

During the meeting, we also discussed the possibility of allowing the City to submit annual report information via electronic format. After review of the terms of the Consent Agreement, including Paragraph 23 and Section 6 of the Appendix, we have determined that without the need for an amendment to the Consent Agreement we can allow a partial electronic submission of information for the annual reports. The City is authorized to submit portions of its annual reports to the EPA and MDNR in electronic format, as follows:

- The original cover letter and certification statement, along with a list of any attachments or appendices, must continue to be submitted by mail to the EPA, with a copy to the MDNR, in accordance with Paragraph 23 of the Consent Order.
- The attachments or appendices may be submitted to the EPA and MDNR in electronic format. Electronic submissions should be made in a widely available format, such as PDF, Word or Excel. The electronic data may be submitted either on a compact disc or flash drive included with the original cover letter and certification, or as an electronic mail submittal sent at the same time the annual report is mailed to EPA. Please include a copy of the cover letter and certification as one of the items on the disk or in the email. Email submittals should be sent to the attention of Wayne Dillard, [dillard.wayne@epa.gov](mailto:dillard.wayne@epa.gov), unless otherwise directed in writing by the EPA. The MDNR has requested that email submittals to its office be sent to Sieu Dang at [sieu.dang@dnr.mo.gov](mailto:sieu.dang@dnr.mo.gov).

The City provided updates regarding previous actions and upcoming activities. Please confirm whether this summary accurately reflects the matters discussed with the City and provide any relevant additional details regarding these matters:

- The City believes its previous flow monitoring data demonstrates the most significant source of inflow and infiltration is coming from the Northeast section of its collection system.
- To address this, the City has contracted for cured in place pipe (CIPP) lining for that area to be performed later this calendar year.
- The City also plans to perform additional flow monitoring next calendar year, in a timeframe similar to the original flow monitoring, to assess whether the CIPP work provided significant improvement in the I/I rate.
- The City has also been either replacing or plugging its perforated manhole covers in order to reduce inflow.
- The City also indicated it is using its tracking system in a manner to support reporting as well as to monitoring the performance of the system.

In the City's next annual report, we would appreciate additional details of past actions, upcoming activities and an explanation of how the past and planned actions have addressed, or are expected to address, a reduction in the frequency and volume of sanitary sewer overflows, basement backups and bypasses at the wastewater treatment plant. The annual report should include all information required by the Order on Consent, with specific focus on the following issues:

- An updated Plan of Action and/or Continuing Improvement Plan.
- A description of cleaning, CCTV inspections and flow monitoring planned following completion of CIPP work.
- The total number of manhole lids replaced or sealed, and the percentage of all manhole lids that represents.
- An update on completion of CIPP in the problem basin. An update on eliminating Lift Station No. 3.
- Any evidence to confirm or refute whether the sewer basin where the CIPP is being performed in late 2013 is indeed the most significant source of I/I leading to SSOs at manhole J4-MH-120.
- A discussion of the use and effectiveness of the Data Tracking System to support internal tracking of events/actions and used as information source for system management (e.g., identification of problem areas).

We appreciate the efforts the City is taking to manage its wastewater collection and treatment system and to address the requirements of the Order on Consent. If you have any questions regarding this letter or the matters addressed by the Order on Consent, please contact Wayne Dillard at 785-550-7885 or [dillard.wayne@epa.gov](mailto:dillard.wayne@epa.gov).

Sincerely,



Patricia Gillispie Miller  
Senior Counsel

ccs via email: Jerry Hamby  
Public Works Director, Bolivar, MO  
[publicworks@bolivar.mo.us](mailto:publicworks@bolivar.mo.us)

Robert Brundage  
Newman, Comley & Ruth, PC  
*rbrundage@ncrpc.com*

Sieu Dang  
Missouri Department of Natural Resources  
*sieu.dang@dnr.mo.gov*